

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS, DERIEON)	
Plaintiff,)	
)	
vs.)	22-CV-2026
)	
SGT. SURANE.et al.,)	Judge Steven C. Seeger
)	
Defendant(s).)	

**MOTION TO WITHDRAW KRYSTAL GONZALEZ AS
COUNSEL FOR DEFENDANT**

Defendant, Sgt. Surane, (“Defendant”), by his attorney, KIMBERLY M. FOXX, State’s Attorney of Cook County, through her assistant, Krystal Gonzalez, pursuant to Local Rule 83.17, hereby moves this Court to grant Krystal Gonzalez leave to withdraw as an attorney of record in this matter. In support of this motion, Defendant states as follows:

1. Defendant is represented in this matter by the Cook County State’s Attorney’s Office (“CCSAO”).
2. Krystal Gonzalez entered an appearance as an Assistant State’s Attorney and has been one of the attorneys of record in this matter.
3. Krystal Gonzalez is leaving the employment of the CCSAO on February 20, 2024, and as a result will no longer be involved in the representation of any Defendant in this matter.
4. ASA Joshua Bransford has an appearance on file as an Assistant State’s Attorney and will remain as counsel of record for Defendants in this matter. (Dkt. 54).
5. No Defendant will be left without representation as a result of Krystal Gonzalez’s withdrawal from this matter.

6. Accordingly, the Defendant seeks to withdraw the appearance of Krystal Gonzalez in this matter, and to terminate all ECF notices to her.

WHEREFORE, Defendant respectfully requests that the Court enter an order terminating the appearance of Krystal Gonzalez and to terminate notifications to her in this matter.

Date: February 20, 2024

Respectfully submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/ Krystal Gonzalez
Krystal Gonzalez
Assistant State's Attorney
Civil Actions Bureau
500 Richard J. Daley Center
Chicago, IL 60602
(312) 603-8132
krystal.gonzalez@cookcountysao.org

CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above motion and foregoing to be served on all Parties pursuant to ECF, in accordance with the rules of electronic filing of documents on this February 20, 2024. I further certify that in accordance with Fed. R. Civ. P. and LR 5.5 and the General Order on Electronic Case Filing (ECF), the foregoing was served upon all ECF users and to the users below via U.S. Mail

Derieon Thomas
20180815131
Cook County Jail
2700 S. California Ave.
CHICAGO, IL 60608

/s/ Krystal Gonzalez
Krystal Gonzalez